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U.S.D.C., Eastern District of New York

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June 25, 2025

Via ECF

Honorable Magistrate Judge Joseph A. Marutollo
United States District Court
Eastern District of New York

Re: Lynch v. DOE, et al.
Case No.1:24-CV-7795

Dear Judge Marutollo:

I write in response to the Defendant's request for an extension of time to file the fully briefed motion to dismiss, currently due on June 26, 2025.

I respectfully object to the Defendant's request for the following reasons:

1. **Failure to Timely Serve the Court's Order:** The Court's order dated June 16, 2025, required the Defendant to serve me with a copy of the order by June 17, 2025. As of today's date, I have not received service of the order as directed by the Court.
2. **Violation of the Court's Rules on Extensions:** Per **Section IV of Your Honor's Individual Rules**, all requests for extensions of time must be filed on ECF as a "Motion" (not a "Letter") **at least two (2) business days prior to the deadline**. The Defendant's request was made the day before the filing deadline, in violation of this requirement. Additionally, it appears that no telephone call was made to Chambers as required for untimely requests.
3. **Repeated Delays:** The Defendant has previously requested and been granted an extension based on counsel's absence due to her honeymoon, and other "out of office" conflicts. The Defendant now seeks a further extension citing the same scheduling conflict. This continued pattern of delay is prejudicial to me as a pro se plaintiff.
4. **Prejudice:** I am prepared to comply with the current schedule. Allowing additional extensions at this time would cause unnecessary delay and unfairly hinder my ability to proceed with my case in a timely manner.

For these reasons, I respectfully request that the Court deny the Defendant's untimely request for an additional extension.

Thank you for your time and consideration.

Respectfully submitted,
Corrine Lynch
Pro Se Plaintiff